IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

CIVIL ACTION NO.:

ILA BROOKE CAUDILL, Plaintiff, v. OPTIMUM OUTCOMES, INC. and EXPERIAN INFORMATION SOLUTIONS, INC., Defendants.	))))))))))))	**NOTICE OF REMOVAL**

TO: THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Defendant, Optimum Outcomes, Inc. ("Optimum"), in accordance with 28 U.S.C. § 1446, hereby gives notice and does remove to this Court the civil action bearing the caption *Ila Brook Caudill v. Optimum Outcomes, Inc. and Experian Information Solutions, Inc.*, 15 CVD 002205, which is now pending the General Court of Justice, District Court Division, Wake County, North Carolina, for the following reasons:

1. A copy of the complaint in the above-captioned lawsuit was filed on February 13, 2015. Plaintiff served the complaint on Optimum via registered agent on February 23, 2015. In accordance with 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon Optimum as of the date of this Notice of Removal are attached hereto as Exhibit A.

2. Plaintiff's Complaint alleges a violation of the Fair Credit Reporting Act ("FCRA"), 15 U.S.C § 1681 *et seq.*, and a violation of the Fair Debt Collection Practices Act, ("FDCPA"), 15 U.S.C. § 1692 *et seq.*

3. To the extent Plaintiff attempts to state a claim under the FCRA and FDCPA, this Court has jurisdiction under 28 U.S.C. § 1331.

4. Plaintiff is a citizen and resident of Wake County, North Carolina.

5. Optimum is a corporation organized and existing under the laws of the Illinois, with its principal place of business in Grover, Illinois.

6. The United States District Court for the Eastern District of North Carolina has original jurisdiction over Plaintiff's causes of action pursuant to 28 U.S.C. §§ 1331. This action may therefore be removed to this Court pursuant to 28 U.S.C. §§ 1331, 1441, and 1446.

7. As required by 28 U.S.C. § 1446(d), written notice of filing of this Notice of Removal is being served on Plaintiff and filed with the Clerk of Distict Court for Wake County, North Carolina. A true and accurate copy of that Notice of Filing is attached hereto as Exhibit B.

8. Co-defendant Experian Information Solutions, Inc. consents to removal.

9. The time period for filing this Notice of Removal in accordance with the provisions of 28 U.S.C. § 1446 has not elapsed as of today's date.

10. Optimum does not waive any defenses by filing this Notice of Removal and reserve the right to assert such defenses including, but not limited to, defenses concerning personal jurisdiction and venue. Optimum reserves the right to amend or supplement this Notice of Removal.

WHEREFORE, because this Court has jurisdiction pursuant to 28 U.S.C. §§ 1331, removal of this action is appropriate and Defendant removes this case from the District Court Division for Wake County, North Carolina, to this Court.

Respectfully submitted, this the 24th day of March 2015.

WILLIAMS MULLEN

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CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2015, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system and hereby certify that a copy of the foregoing was sent by regular U.S. mail to the following parties:

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